

## **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**

**FEMHEALTH USA, INC., d/b/a  
CARAFEM,**

**Plaintiff,**

**v.**

**RICKEY NELSON WILLIAMS, JR.;  
BEVELYN Z. WILLIAMS;  
EDMEE CHAVANNES; OPERATION  
SAVE AMERICA; JASON STORMS;  
CHESTER GALLAGHER; MATTHEW  
BROCK; COLEMAN BOYD; FRANK  
LINAM; BRENT BUCKLEY; and AJ  
HURLEY,**

**Defendants.**

**Civil Action No. \_\_\_\_\_**

**DECLARATION OF MICHELLE DAVIDSON**

I, Michelle Davidson, declare the following under 28 U.S.C. § 1746 and penalty of perjury:

1. I am an adult over 18 years of age and have personal knowledge of the facts in this declaration.

2. I am the Security Director at National Abortion Federation (“NAF”). NAF connects, represents, serves and supports providers of abortion-related healthcare throughout the country. In my role as Security Director, I provide security support and assistance to member abortion providers in the United States, Canada, Mexico City, and South America. I have been in that role for eleven years.

3. On approximately July 2021, I was made aware that Operation Save America (“OSA”), a Christian fundamentalist anti-abortion group, was planning its annual convention in middle Tennessee in 2022. This is an annual event for OSA. Once we knew the city, we made

plans to provide additional support to clinics and law enforcement. I have personal knowledge from surveillance and intelligence gathering that OSA and its members have been involved in clinic protests across the country and protests at both abortion clinics in middle Tennessee, an accompanying illegal activity at those clinics. One of those clinics is carafem.

4. From our work providing security at healthcare facilities across the country, we are familiar with OSA, its members, and the history of illegal activity by members, including Defendants Jason Storms (Director of OSA), Matthew Brock (Assistant Director of OSA), Chet Gallagher (OSA member), Coleman Boyd, Bo Linham, Brent Buckley, and AJ Hurley. Defendant Gallagher has been arrested on multiple occasions for interfering with access to healthcare facilities, blockading entrances, and threatening patients. From our surveillance of OAS, we understood that the national gathering planned in Middle Tennessee was expected to include members known to have blockaded, trespassed, or otherwise acted illegally, and escalated security procedures and support for local members.

5. On July 23 and 24, 2022, the NAF security team surveilled the likely locations of the OSA gatherings, including the primary OSA hotel and base locations in order to assess the number of participants, identify any known vehicles and trailers on site, and establish a vehicle traffic baseline and to determine travel time between clinics and OSA staging areas. I also visited both Planned Parenthood and Carafem in order to establish in-person contact with clinics, security, and to quickly assess for anti-activity, vulnerabilities, and possible staging points. The NAF team met with local FBI intelligence in order to develop a relationship between NAF and the local intelligence community, validate existing information, and establish lines of communication.

6. On July 25, 2022, the NAF team attended a large protest at Planned Parenthood, Downtown Nashville, from 8:30 am – 12:30 pm. Around 130-150 protesters (adults and children)

held graphic signs and used amplified devices to preach while lining the streets outside the facility. 5-8 counter protesters were also present. There were 4-5 marked police cars stationed in the parking lot along with 3-4 volunteer escorts and 3 contract security guards.

7. On July 26, 2022, The NAF Security Team, alongside Pat Wheeler, Carafem Director of Security, provided support to Carafem in Mount Juliet, TN. For approximately 7 hours, NAF provided surveillance, coordinated communications with partner organizations, and a physical presence. Through intelligence gathering, we were able to prepare the clinic for a possible “interposition” by protesters, many of whom have a history of obstructing access to Carafem and other member clinics. Approximately 150 protesters lined both sides of the street outside the facility with graphic signs, blaring megaphones, and harassed vehicles that entered the parking lot.

8. When the crowd began to splinter into smaller factions, a group of men crossed property lines into the parking lot and began to approach the front entrance of the multi-tenant building. The extremists involved were Jason Storms (Director of OSA), Matthew Brock (Assistant Director of OSA), Chet Gallagher (OSA member), Coleman Boyd, Bo Linham, Brent Buckley, and AJ Hurley.

9. I know and recognize these individuals from their extensive histories in harassing, threatening, and blockading other healthcare facilities.

10. Immediate action was taken to alert law enforcement. NAF assisted clinic staff with bringing patients from the waiting room and into a more secure area. NAF provided staff and patients with information and instructions for the lock down situation. Law enforcement engaged the individuals who were being blocked by security guards at the front entrance. During the entirety of our time at the location, we were able to confirm over 20 incidents of trespassing.

11. In a video of the defendants after the blockade, Defendant Storms spoke with members of the Mt. Juliet Police Department. He compared the ongoing operations of the clinic to the recent Uvalde school shooting, indicating that he had amassed “300 people that are intent on upholding Tennessee law” outside the clinic, implying that they would take matters into their own hands if police did not stop operations of the clinic. Defendant Brock reiterated that “we have men out here who are willing to do what needs to be done.”

12. We received information from Deputy Chief of Mt. Juliet Police Mullins (DC Mullins) that OSA had plans to return to the facility the next day, which was a shift in the original schedule.

13. On July 27, 2022, two members of the NAF security team returned to Carafem in Mt. Juliet to provide an additional day of support, due to the sudden change in the OSA schedule. Approximately 30-35 individuals arrived at the medical building and began protesting on the sidewalks outside the medical building with graphic signs and megaphones.

14. DC Mullins arrived at the clinic and stated that OSA was planning on occupying the hallways of Carafem “sometime soon.” He did not provide specific information on how the police department planned to prevent this act of obstruction.

15. At the conclusion of the protest at carafem, the remaining members of OSA made their way to city hall in Nashville and rejoined the larger group. Two members of the NAF team followed to monitor the activity. The protestors displayed graphic signs with anti-abortion sentiment and used amplified devices while disseminating anti-abortion materials though out the area. An estimated 150-200 protesters were observed. Bevelyn Beatty Williams, her husband, Rickey Williams, and their associate Edmee Chavannes were notably present. Their presence led

to notifications to clinics as these individuals are known to invade facilities and are extremely aggressive in their disruption.

16. According to our intelligence, Bevelyn Beatty Williams, Rickey Williams, and Edme Chavannes are closely associated with OSA and frequently appear together at protests and OSA events since at least 2019.

17. I returned to carafem the next day, on July 28, 2022, to assist Mr. Wheeler with the targeted protest for the day. The other members of the NAF team went to observe and assist at the Planned Parenthood facility. Approximately 50-60 protesters lined the sidewalks and played a crying baby over large speakers that were aimed at the facility. Patients were having a hard time hearing staff and were visibly upset by the noise.

18. At approximately 11:20 am, I heard loud voices coming from the hallway outside the clinic and knew from experience that Bevelyn and Edmee were there. Once again, the staff brought the patients from the waiting room and into a secure location behind locked doors and the police were called. I called AUSA Amanda Klopf. Three minutes later, building security attempted to address the three individuals but was ineffective. After almost six minutes of screaming, DC Mullins arrived and escorted the extremists out of the building.

19. A patient was then able to access the building. She had been hiding around the corner in the hallway and unable to access the clinic. DC Mullins came back up to the clinic moments later and I explained to him who the individuals were and my knowledge of their prior activity and arrest history. My team was notified of the incident, and they alerted Planned Parenthood staff to be aware. Approximately one hour later, the three extremists arrived at Planned Parenthood, pretended to need care to try and gain access and when they were denied, they parked

near-by and proceeded onto the property, which was live-streamed on several social media sites.<sup>1</sup> DC Mullins watched the live stream with Mr. Wheeler and myself and seemed surprised when Nashville PD discovered a hand gun on Rickey Williams while detaining him. The video shows a Metro police officer removing the gun around minute 15 of the video. All three were arrested along with another woman, Brea Marie Crum.

20. In the course of my duties, NAF regularly obtains statements from witnesses to similar events and have attached statements that I have gathered from clinic staff and patients from immediately after the events described above. In these statement, staff members at the facility describe feeling “panicked,” “uneasy,” “unsafe” and “threatened,” believing they were at imminent risk of harm. Staff describe having to change both their personal security habits (for example, changing their routes to and from their home, paying attention to who is following them on the interstate), as well as the security operations of the clinic (for example, evaluating whether they can take walk-in appointments ever again), due to the intrusions. Patients reported that they felt “scared to come back.” Staff members reported nightmares and the need to seek psychiatric assistance for the ongoing fear. One staff member stated:

We were told at some point by Officer Mulliins [sic] that the OSA was planning to occupy the hallway between now and 8/25/22 when the trigger ban takes effect. This makes me feel anxious all over again because it could happen any time and we may not have the [security] team here. I am concerned for the clinic staff's safety. I am scared to leave and run errands, or take time off in case the incident happens when I am not here. Occasionally, I have had to bring my kids to grab something from the clinic, and I feel that I can no longer do that for fear of putting them in unnecessary danger. My anxiety around this has caused me to have trouble sleeping, feel [completely exhausted], and fearful. Lately, we have increased our home [security] by adding blinds to the front of our house and other [security equipment], which has been a financial [burden]. I am constantly worried about the [safety] of my children.

Dated: July 29, 2022

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<sup>1</sup> [https://www.facebook.com/watch/live/?ref=watch\\_permalink&v=641402020213264](https://www.facebook.com/watch/live/?ref=watch_permalink&v=641402020213264).

/s/ Michelle Davidson

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Michelle Davidson